

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS;
Case No. 1:23-cv-10211-SHS

**NOTICE OF ERRATA AND
CORRECTION TO DKT. 55 IN THE
AUTHOR ACTIONS**

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

Please take notice of the following errata and correction to the parties' joint Opposition to Motion to Intervene and Dismiss, Stay or Transfer filed in the consolidated Author Actions, Dkt. 55: on page 5, Plaintiffs inadvertently listed the filing date for the Consolidated Amended Complaint as February 2, 2024; it has been corrected to read "February 5, 2024." Minor typographical errors, listed below, have also been corrected.¹

A corrected copy of Plaintiff' Opposition to Motion to Intervene or Dismiss, Stay or Transfer is attached to this filing.

Dated: March 12, 2024

Respectfully submitted,

/s/ Rachel Geman

Rachel Geman
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: 212.355.9500
rgeman@lchb.com

Reilly T. Stoler (*pro hac vice forthcoming*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
rstoler@lchb.com
ibensberg@lchb.com

Wesley Dozier (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
222 2nd Avenue, Suite 1640
Nashville, TN 37201
Telephone: 615.313.9000
wdozier@lchb.com

/s/ Rohit Nath

Justin A. Nelson (*pro hac vice*)
Alejandra C. Salinas (*pro hac vice*)
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: 713-651-9366

¹ For ease of reading, Plaintiffs also removed various extra spaces.

jnelson@susmangodfrey.com
asalinas@susmangodfrey.com

Rohit D. Nath (*pro hac vice*)
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: 310-789-3100
rnath@susmangodfrey.com

J. Craig Smyser
SUSMAN GODFREY L.L.P.
1901 Avenue of the Americas, 32nd Floor
New York, New York 10019
Telephone: 212-336-8330
csmyser@susmangodfrey.com

/s/ Scott Sholder
Scott J. Sholder
CeCe M. Cole
COWAN DEBAETS ABRAHAMS & SHEPPARD LLP
41 Madison Avenue, 38th Floor
New York, New York 10010
Telephone: 212.974.7474
ssholder@cdas.com
ccole@cdas.com

Attorneys for Plaintiffs and the Proposed Class

List of Typographical Error Corrections

Page	As in Original	Correction
3	“The Authors Actions”	“The Author Actions” ²
3	(LLMs),	(LLMs);
3	Proposed Intervenor’s	Proposed Intervenor
4	a the Authors Guild	the Authors Guild
5	Subsequently, Plaintiffs	Plaintiffs
6	issue for Plaintiffs the proposed Classes	issue for the proposed Classes
6	Class’	Classes’
11	intervention”	intervention.”
12	regime for artificial intelligence.”	regime for artificial intelligence.
15	(and Author Classes) give	(and Author Classes) to give
15	bogged down Rule 12 motions	bogged down by Rule 12 motions

² Plaintiffs made similar corrections to “Author Actions” on pages 16, 17, 18, 19, 20, and 23.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

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Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

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Defendants.

Case No. 1:23-cv-08292-SHS;
Case No. 1:23-cv-10211-SHS

**DECLARATION OF SERVICE BY
ROHIT D. NATH IN SUPPORT OF
AUTHOR CLASS PLAINTIFFS'
NOTICE OF ERRATA AND
CORRECTION TO DKT. 81 IN THE
AUTHORS ACTION**

I, Rohit D. Nath, declare:

1. I am over eighteen years of age, I am not a party to this action, and I am an employee with the law firm of Susman Godfrey L.L.P., in the Los Angeles, California office.
2. My business address is 1901 Avenue of the Stars, Suite 950, Los Angeles, California 90067.
3. On March 12, 2024, I served a copy of the author class Plaintiffs' Opposition to Motion to Intervene and Dismiss, Stay or Transfer via email upon the following persons:

*Attorneys for Defendant,
OpenAI Inc.,*

*Attorneys for Defendant,
Microsoft Corporation*

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 12, 2024, at Los Angeles, California.

Rohit D. Nath
Rohit D. Nath